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Mary P. Morningstar
Assistant General Counsel
Environmental Law



December 6, 2005

Mr. Harry Steinmetz
U.S. Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Safety Light Corporation, Bloomsburg, Pennsylvania

Dear Mr. Steinmetz:

On behalf of Lockheed Martin Corporation ("Lockheed Martin"), I am responding to the CERCLA Section 104(e) request for information about any disposal by Lockheed Martin at the Safety Light Corporation site ("the Site") in Bloomsburg, Pennsylvania.

Lockheed Martin has searched its active and archived files for any reference to the Site, as well as for any reference to the other names by which this may have been known or affiliated (i.e., U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, and Isolite). I worked with Lockheed Martin's Senior Paralegal for the Environment, Safety & Health Legal Group, Ms. Dana Bennett, to search our files for any reference to any of the names listed above, as well as to Safety Light.¹

Ms. Bennett found one folder referencing a patent license held by Lockheed Aircraft Corporation in 1968, related to a luminescent material. The license was between Lockheed Aircraft Corporation and U.S. Radium Corporation, having offices in Morristown, New Jersey. The license expired in 1972. Nowhere in the license is there evidence that Lockheed Aircraft Corporation sent any materials to U.S. Radium. In addition, the dates of 1968 to 1972 are inconsistent with the material included in the 104(e) request (i.e., 1958 to 1960). Finally, the location of the U.S. Radium facility was in New Jersey, not in Bloomsburg, Pennsylvania. Notwithstanding these variable facts, Lockheed Martin would be willing to share the licensing documents with EPA.

In relation to the folder discussed above, Lockheed Martin also evaluated the documents attached to the 104(e) request, which purport to implicate "Lockheed Aircraft Corporation" by listing Atomic Energy Commission ("AEC") license numbers on copies of ledger paper, with a notation about numbers of curies (apparently radioactive

¹ I have attached to this letter an affidavit from Ms. Bennett.

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materials) for which the license may be required. These purported licenses and grams of curies held by Lockheed Aircraft Corporation date back to the late 1950s and early 1960s. At that time, Lockheed Martin operated an aircraft manufacturing facility in Burbank, California, and had recently opened a facility in Marietta, Georgia. The Burbank facility closed in 1990, but the active and archived files have been maintained over the years. The Marietta facility is an ongoing manufacturing operation.

In order to fully answer EPA's request for information about these obscure copies of ledger paper, particularly since the dates and locations differ from the license discussed above, I contacted the counsel and environmental, safety and health professionals at the Marietta facility, to ensure that they had no information about the use of Safety Light during the time period implicated in the copied ledger pages. They could find nothing in their files, except for a recent reference, from late 1990s, to a Lockheed Martin facility in Pennsylvania purchasing Tritium exit signs from Safety Light and sending them to Safety Light for recycling. The Lockheed Martin facility in Pennsylvania is not part of the Lockheed Martin Aeronautics Company, which is the successor to Lockheed Aircraft Corporation, so it is apparent that this recent use of Safety Light is unrelated to the alleged use of Safety Light by Lockheed Aircraft in the late 1950s and early 1960s.

Lockheed Martin answers in the negative about any use of Safety Light by the Lockheed Aircraft Corporation in the late 1950s or early 1960s. If we discover any more information, we will forward it to EPA.

Please feel free to call with any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mary P. Morningstar', with a stylized, flowing script.

Mary P. Morningstar

cc: Kara Edewaard
Dana Bennett

**AFFIDAVIT OF DANA L. BENNETT IN SUPPORT
OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY'S
§104(e) REQUEST FOR INFORMATION ON THE
SAFETY LIGHT SUPERFUND SITE**

I, Dana Bennett ("Affiant"), do hereby attest that I have made the following statement in accordance with all evidentiary laws and regulations.

Affiant states that she is a Senior Paralegal, for Lockheed Martin Corporation ("Lockheed Martin"), and that she has the authority to review most archived and active records maintained by Lockheed Martin ("Records").

Affiant states that she made a thorough and diligent search of the Records and found one reference to U.S. Radium, but found no reference to the following entities in either the active or archived files maintained by Lockheed Martin: Safety Light, Inc.; Lime Ridge Industries; USR Industries; USR Metals; Metreal; and Isolite. A discussion of the records related to U.S. Radium appears in Lockheed Martin's response to the U.S. EPA Section 104(e) letter, to which this affidavit is attached.

Affiant further attests that she is making this statement under oath.

SIGNED:

DATE:


Dana L. Bennett

12-6-05

TODD M. KNOWLTON
NOTARY PUBLIC, STATE OF MARYLAND
My Commission Expires February 6, 2008





From: Origin ID: (301)214-3399
Todd Knowlton
LOCKHEED MARTIN CORPORATION
6801 ROCKLEDGE DRIVE

BETHESDA, MD 20817

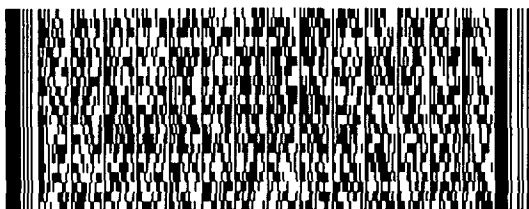


CLS 102705/09/16

SHIP TO: (301)214-3397

BILL SENDER

Harry Steinmetz
USEPA
USEPA, Region 3
1650 Arch Street
Philadelphia, PA 19103



Ship Date: 06DEC05
ActWgt: 1 LB
System#: 1246307/INET2300
Account#: S *****

REF:



Delivery Address Bar Code

PRIORITY OVERNIGHT

WED

TRK# 7924 5627 7158

FORM
0201

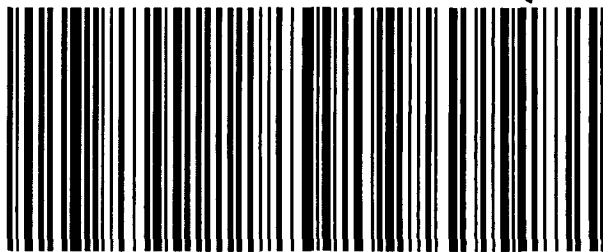
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